

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION (AKRON)

*In re:*

SEAN SABOLESKY and  
KERRI SABOLESKY,  
  
Debtors.

CHAPTER 7 CASE NO.: 18-52205

JUDGE: ALAN M. KOSCHIK

**NOTICE OF MOTION TO AVOID  
JUDICIAL LIEN OF MIDLAND  
FUNDING LLC**

Debtors Sean and Keri Sabolesky have filed a Motion to Avoid a Judicial Lien in the above-referenced bankruptcy.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have any attorney, you may wish to consult one.)

If you do not want the Court to authorize the Motion, or if you want the Court to consider your views on the Motion, then on or before January 15, 2019, you or your attorney must:

File with the Court written objections and request for a hearing, and a written response explaining your position, at:

Clerk of Courts  
U.S. Bankruptcy Court  
John F. Seiberling Federal Building & U.S. Courthouse  
2 South Main St.  
Akron, OH 44308

If you mail your request/response to the Court for filing, you must fmail it early enough so that the Court will receive it on or before the date stated above. You must also mail a copy to:

Sremack Law Firm LLC  
2745 South Arlington Road  
Akron, Ohio 44312

If you or your attorney do not take these steps, the Court may decide that you do not oppose the Motion and may enter an Order granting the Motion.

DATED: December 22, 2018

Respectfully submitted,

/s/ Rebecca J. Sremack

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Rebecca J. Sremack #0092313  
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Akron, Ohio 44312  
Phone: 330.644.0061  
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*Counsel for Debtors*

### NOTICE

No hearing shall be held on the foregoing Motion, and the same shall be granted without a hearing, unless a party in interest files with the Court a written request for a hearing within twenty-one (21) days of receipt of this notice and serves a copy of the said hearing request upon counsel for the Debtors. 11 U.S.C. § 102(1)(b).

### CERTIFICATE OF SERVICE

I hereby certify that on December 22, 2018, a copy of the foregoing *Notice of Motion to Avoid Judicial Lien Held by Midland Funding LLC* was filed electronically via this Court's ECF system and served upon all parties indicated on the electronic filing receipt, including:

The Chapter 7 Trustee (Harold A. Corzin)  
The U.S. Trustee  
Edward A. Bailey, attorney for mortgagee Federal National Mortgage Association

It was also sent this same day by regular mail to the following, along with all creditors identified on the Creditor Matrix:

Sean and Kerri Sabolesky  
1647 Redwood Ave.  
Akron OH 44301

Midland Funding LLC  
2365 Northside Dr #300  
San Diego CA 92108

Nevenka Pavlovic  
c/o Midland Funding LLC  
PO Box 30968  
Middleburg Heights, OH 44130

/s/ Rebecca J. Sremack

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Rebecca J. Sremack #0092313  
*Counsel for Debtors*